

Privacy Notice

The Szikra Movement Association, as the data controller, informs its supporters (hereinafter referred to as the data subject) that it respects the personal rights of the data subject and that it will act on the basis of the following privacy statement (hereinafter referred to as the Privacy Statement) when processing personal data. The Data Controller reserves the right to amend the Notice in order to bring it into line with changes in legislation and other internal regulations. The current version of the Privacy Notice is available on the controller's website and at its registered office.

I. The Data Controller

Name: Szikra Movement Association

Headquarters: Fecske utca 41-43, V. floor, 1. door; 1084 Budapest, Hungary.

Registration number: 01-02-0017529

Tax number: 19291152-1-42

E-mail address: szikra@szikramozgalom.hu

Website: szikramozgalom.hu

II. Information on the processing of personal data

The Szikra Movement Association (hereinafter referred to as the Association or the Controller) shall inform the data subject – in a clear, plain and detailed manner – of all facts relating to the processing of his or her personal data, in particular the purpose of the processing, the legal basis of the processing, the scope of the persons entitled to access the personal data, the duration of the processing, the fact that the controller processes the personal data of the data subject with the consent of the data subject and/or for the purpose of complying with a legal obligation to which the controller is subject or for the purposes of the legitimate interests of the controller or of a third party, as set out in this statement. The information shall also cover the data subject's rights and remedies in relation to the processing.

III. Legal basis, purpose and duration of the processing of personal data

The Association's data management principles comply with the applicable data protection legislation, in particular:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter "GDPR");

- Act CXII of 2011 of the Hungarian National Assembly on the Right of Informational Self-Determination and Freedom of Information (hereinafter "Information Act");
- Act V of 2013 of the Hungarian National Assembly on the Civil Code ("Civil Code");
- Act CLXXV of 2011 of the Hungarian National Assembly on the Freedom of Association, Non-profit Status, and the Operation and Support of Civil Organisations ("Civil Act");
- Act CVIII of 2001 of the Hungarian National Assembly on certain aspects of electronic commerce services and information society services ("E-Commerce Act");
- Decree 350/2011 (XII. 30) of the Hungarian National Government on Certain Issues of CSO Financial Management, Fundraising and Public Benefit Status.

The processing of the data subject's personal data is only carried out to the extent necessary for the purposes set out below. At each stage of the processing, the controller shall verify that it is adequate for the purpose.

1. Maintaining Contact

To contact persons sympathetic to the Association and its objectives, through the channel of their choice (telephone, e-mail, post), regarding ongoing and planned activities, and other means of expression and action.

Purpose of the processing: to contact the data subject through the channels indicated by the data subject in relation to ongoing and planned matters and actions.

Legal basis for processing: processing is based on the data subject's explicit consent (Articles 6(1)(a) and 9(2)(a) GDPR).

Data processed: name, telephone number, e-mail address, postal address, consent to processing.

Duration of processing: withdrawal of consent, or up to 2 years from the last contact.

2. Processing for statistical purposes

Production of statistical data aggregates for operational planning and advertising.

Purpose of processing: to create statistical databases free of personal data.

Legal basis for processing: processing is based on the data subject's voluntary consent (Article 6(1)(a) GDPR).

Data processed: name, postal code, e-mail address.

Duration of processing: creation of aggregate data for statistical purposes.

IV. Access to personal data, recipients of the processing

The personal data of the data subject may only be disclosed to the members and employees of the Association who have access rights in relation to the relevant data processing purpose, or to persons and organisations carrying out data processing activities for the Association on the basis of a contract, to the extent necessary for the performance of their activities. The recipients carrying out data processing activities are:

- Action Network (1900 L St NW, Suite 900, Washington DC 20036; Privacy Policy: <https://actionnetwork.org/privacy>) provision of IT services, database management system;
- Estratos Digital GmbH Sommerhaidenweg 98 1190 Wien, Austria; Privacy Policy: <https://www.estratos.eu/privacy>) provision of IT services, database management system;
- Segment (100 California Street, Suite 700, San Francisco, CA 94111 USA; Privacy Policy: <https://segment.com/docs/privacy/complying-with-the-gdpr/#opting-into-the-data-processing-agreement-and-standard-contractual-clauses>) provision of IT services;
- Hertz LLC. (10. E. Yanonali St., Santa Barbara, California 93101; Privacy Policy: <https://www.zerobounce.net/privacy-policy.html>) provision of IT services;
- Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland; Privacy Policy: <https://cloud.google.com/terms/data-processing-terms>) provision of cloud services.

In cases where the processing of personal data is not carried out by a controller/processor located in the European Economic Area, the data subject has rights and effective remedies available to him or her under the terms of the commitment entered into by the Association with the data controller/processor (Art. 46 GDPR). In case the recipient of the personal data is a controller/processor located in the United States, the Association will use its best efforts to ensure that the personal data transferred are not accessed by US national security agencies, in accordance with the relevant decisions of the Court of Justice of the European Union.

V. Rights of the data subject and their enforcement

Through this Privacy Statement, the Association informs its supporters that they may request access to, rectification, erasure or restriction of the processing of personal data concerning them, and object to the processing of their personal data, as follows.

1. Right to access

The Association shall, upon request, inform the data subject whether or not his or her personal data are being processed. The controller shall respond in writing within one month of receipt of the request at the latest, as to whether the processing of the personal data of the data subject is ongoing. In case the feedback from the controller indicates that the processing of the personal data of the data subject is ongoing, the controller shall provide information on:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the envisaged period of storage of the personal data or the criteria for determining that period;
- the provision of information concerning the rights to rectification, erasure, restriction of processing of personal data and the right to object to the processing of personal data;
- information on how to lodge a complaint with a supervisory authority;
- all available information on the sources of the personal data, if the personal data have not been collected by the controller from the data subject.

2. Right of rectification

The Association shall, at the request of the data subject and without undue delay, rectify inaccurate or incomplete personal data relating to the data subject, provided that the data subject has supplied accurate data.

3. Right of withdrawal

Consent to personal data may be withdrawn at any time without the need to provide justification. Such withdrawal does not affect the lawfulness of the processing based on the consent prior to its withdrawal.

4. Right to erasure

The Association shall delete personal data concerning the data subject without

undue delay at the request of the data subject in case one of the following grounds applies:

- the purpose of the processing no longer justifies the processing;
- the data subject has withdrawn consent to the processing of his or her personal data and there is no other legal basis for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the personal data have been unlawfully processed;
- the erasure of the data is required by law.

Personal data may not be deleted if its processing is necessary for the following reasons:

- processing of personal data for the performance of a task carried out in the exercise of a legal obligation to which the controller is subject;
- for the establishment, exercise or defence of legal claims.

5. Right to restriction

The Association shall, at the request of the data subject and without undue delay, restrict the processing of personal data if one of the following grounds applies:

- the data subject contests the accuracy of the personal data (in which case the period of restriction is the period of the controller's verification);
- the processing is unlawful, but the data subject requests a restriction of the use of the data instead of erasure;
- the controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment or defence of legal claims;
- the data subject contests the accuracy of the personal data (in which case the period of restriction is the period of the controller's verification);
- the processing is unlawful, but the data subject requests a restriction of the use of the data instead of erasure;
- the controller no longer needs the personal data for the purposes of the processing, but the data subject requires them for the establishment or defence of legal claims;
- the data subject objects to the processing necessary for the purposes of the legitimate interests pursued by the controller or a third party (in which case the period of restriction is the time for determining whether the legitimate grounds of the controller prevail over the legitimate grounds of the data subject).

If the processing falls within the above restriction, the processing of personal data other than storage shall only be carried out with the consent of the data subject, for the establishment, exercise or defence of legal claims, for the protection of the rights of others or for important public interests.

6. Right to data portability

At the request of the data subject, the Association shall send to the data subject, in a commonly used machine-readable format, the data relating to the data subject which the data subject has provided to the controller.

7. Right to object

Upon the request of the data subject, in which the data subject objects to the processing, the controller shall no longer process the personal data.

The controller may, following the request, demonstrate that the processing is justified on legitimate grounds relating to the establishment, exercise or defence of legal claims.

Requests under points 1 to 7 may be made by e-mail to szikra@szikramozgalom.hu, indicating the e-mail address and name of the data subject. The controller shall inform the data subject of the action taken by e-mail within one month of receipt of the request at the latest.

The controller shall provide the requested information and data free of charge. Where the data subject's request in relation to points 1 to 7 above is manifestly unfounded or excessive, in particular because of its repetitive nature, the controller may, taking into account the administrative costs of providing the information or information requested or of taking the action requested, charge a reasonable fee or refuse to act on the request.

The controller may refuse to comply with a request to exercise the data subject's rights in relation to points 1 to 7 above if the controller proves that it is not possible to identify the data subject.

Where the controller is able to identify the data subject but has reasonable doubt as to whether the request originates from the data subject, the controller may ask the data subject to verify his or her identity.

If necessary, taking into account the complexity of the application and the number of requests, the above one-month deadline may be extended by a further one month. The

data controller shall inform the data subject of the extension of the time limit within one month of receipt of the request, stating the reasons for the delay. If the data subject has made the request by electronic means, the information shall be provided by electronic means, unless the data subject requests otherwise.

If the controller does not act on the data subject's request, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for the failure to act and of the possibility for the data subject to lodge a complaint with a supervisory authority and to exercise his or her right of judicial remedy.

The controller shall inform each recipient to whom or with which the personal data have been disclosed of any rectification, erasure or restriction of processing that it has carried out, unless this proves impossible or involves a disproportionate effort. The controller shall inform the data subject, at his or her request, of these recipients.

The data controller shall provide the data subject with a copy of the personal data processed. If the data subject has made the request by electronic means, the information shall be provided in electronic format.

V. Legal remedy

The data subject has the right to lodge a complaint with the responsible supervisory authority if the data controller infringes the provisions of the GDPR when processing data relating to him or her. Complaints can be lodged with the National Authority for Data Protection and Freedom of Information at the following contact details.

Name: Hungarian National Authority for Data Protection and Freedom of Information

Office: Falk Miksa utca 9-11; 1055 Budapest, Hungary.

Postal address: Pf. 9; 1363 Budapest, Hungary.

Tel.: +36 (30) 683-5969, +36 (30) 549-6838

E-mail: ugyfelszolgalat@naih.hu

The data subject may take the controller to court if his or her rights are infringed. The competent court is the court of the place of residence or domicile of the data subject.